

APPENDIX A

PADAP APPROVAL LETTER FOR:

- SITE CHARACTERIZATION REPORT
- HUMAN HEALTH RISK ASSESSMENT REPORT
- ECOLOGICAL RISK ASSESSMENT REPORT



Pennsylvania Department of Environmental Protection

230 Chestnut Street
Meadville, PA 16335-3481
October 29, 2007

Northwest Regional Office

814-332-6648
Fax: 814-332-6121

Mr. Stephen L. Sherk
Environmental Manager
American Refining Group, Inc.
77 North Kendall Ave.
Bradford, PA 16701

Recd 10/31/07

Mr. Raman Iyer
Director, Environmental Remediation
Crompton Corporation
1999 Benson Rd
Middlebury, CT 06749

Re: Site Characterization Report/
Remedial Investigation Report
Risk Assessment Report
EFACTS No. PF: PF 651768
ARG - Bradford Refinery
City of Bradford, McKean County

Dear Mr. Sherk and Mr. Iyer:

The Department of Environmental Protection (Department) has received and reviewed the July 31, 2007, documents titled "Site Characterization Report (SCR), Baseline Human Health Risk Assessment, and Screening Level Ecological Risk Assessment" for the above referenced facility. The reports were submitted to satisfy your obligation to submit a SCR in accordance with Paragraph 3(b) of the Consent Order and Agreement (COA) between the Department, ARG and Chemtura dated June 8, 2004. The reports were also submitted to satisfy your intentions to submit a Remedial Investigation Report (RIR) and Risk Assessment Report (RAR) for the Act 2 Notice of Intent to remediate (NIR) submitted during May 2004.

The Department of Environmental Protection hereby approves the SCR with modifications summarized below in accordance with Paragraph 4 of the COA and in accordance with the provisions of Act 2. The modifications subject to the approval are as follows:

1. The point of compliance description for buildings on Page AR-27 should be clarified.
2. The use of OSHA standards for off-site industrial properties as explained on page AR-27 should only be used for properties involved in comparable petroleum refining activities. Documentation of off-site properties compliance with OSHA standards should also be provided.

3. If hazardous substances are present on or at adjacent properties, A HSCA Section 512 notice should be provided in any subsequent deed.
4. The Remedial Action Plan/Cleanup Plan should include a schedule for completing negotiations with all 3rd party properties, including government entities and utility owners.
5. Documentation of cooperation to implement the proposed interim health and safety measures outlined in section 11.2 of the SCR at all offsite properties should be included in the cleanup plan.
6. Documentation of cooperation by all offsite parties to permit the Declaration of Covenants contained in appendix AS should be provided prior to submitting your Final Report. The Department acknowledges that deed restrictions may not be applicable to the off-site areas that are under control by public entities or utility companies. Therefore written documentation of these entities willingness to cooperate will suffice in the Cleanup Plan.
7. Modifications to the disposal area closures:
 - a. A minimum of 1 foot of soil cover should be placed at all areas of the Fly Ash, Construction Debris, Refuse/Container Removal, and Former Burn Pit Areas regardless of the current vegetative state or grading requirements.
 - b. Geotextile should be placed on the entire Bauxite Area prior to the placement of the limestone.
 - c. The specifications of the cover material and geotextile should be provided.
 - d. Inspections should be conducted on a quarterly basis on areas with a grade less than 3 percent.
 - e. An erosion and sedimentation plan should be developed for the five areas requiring the addition of cover material and re-grading.
 - f. The modifications to the disposal areas should be addressed in the Cleanup Plan

Please be advised that paragraph 3(d) of the COA requires a Remedial Action Plan to be submitted within 90 days of the Department approval of the SCR. In addition the continuing obligations contained in paragraph 3(a) and 3(c) of the COA should continue.

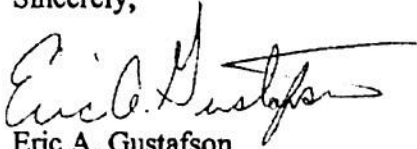
Mr. Stephen L. Sherk
Mr. Raman Iyer

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October 29, 2007

If you have any questions or need further information regarding this matter, please contact Don Hegburg at 814-797-1191.

Sincerely,


Eric A. Gustafson
Regional Manager
Environmental Cleanup Program

cc: D. Hegburg - Knox
D. Moorhead - NWRO
S. Black - NWRO
J. O'Hara - NWRO
File

EAG:JO:jb

